
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Leda Dunn Wettre
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IMRAZ HOSEIN :
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I, Francis Sullivan, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Secret Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.




Special Agent Francis Sullivan
United States Secret Service

Sworn to before me and subscribed in my presence,

February 24, 2020
Date

at Essex County, New Jersey
County and State

HONORABLE LEDA DUNN WETTRE
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Bank Fraud)

On or about July 18, 2019, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

IMRAZ HOSEIN,

knowingly and intentionally executed, and attempted to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the money, funds, or other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises.

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWO
(Bank Fraud)

On or about July 30, 2019, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

IMRAZ HOSEIN,

knowingly and intentionally executed, and attempted to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the money, funds, or other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises.

In violation of Title 18, United States Code, Sections 1344 and 2.

ATTACHMENT B

I, Francis Sullivan, am a Special Agent with the United States Secret Service. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, photographs, and evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint:

a. Defendant Imraz Hosein ("HOSEIN") was employed as an Assistant Branch Manager at Victim Bank-1;

b. Victim Bank-1 was a federally regulated national banking association, the accounts of which were insured by the Federal Deposit Insurance Corporation, making it a "financial institution" as that term is defined in Title 18, United States Code, Section 20;

c. Bank Account-1 was serviced by Victim Bank-1.

2. On or about July 18, 2019 and July 30, 2019, HOSEIN aided Individual-1 in the commission of a scheme to defraud Victim Bank-1 by using his official position at Victim Bank-1 to facilitate unauthorized withdrawals from Bank Account-1.

3. On or about August 1, 2019, Bank Account-1's accountholder reported that unauthorized withdrawals had been taken from Bank Account-1.

4. Surveillance footage shows that on or about July 18, 2019, Individual-1 entered a branch of Victim Bank-1 located in Hoboken, New Jersey. Purporting to be the authorized accountholder of Bank Account-1, Individual-1 presented a fraudulent identification and sought to withdraw funds from Bank Account-1. The teller later advised law enforcement that Individual-1 provided an inaccurate social security number during the transaction. The teller further advised that HOSEIN intervened and used his managerial authority to approve the transaction, and directed Individual-1 to call the bank and confirm his social security number when he got home. Surveillance footage indicates that the transaction took more than ten minutes to complete and shows HOSEIN assisting the teller with the transaction.

Following HOSEIN's intervention, Individual-1 withdrew approximately \$8,320 in U.S. currency, and caused a cashier's check in the amount of approximately \$247,455.83 to be issued from Bank Account-1.¹

5. Surveillance footage shows that on or about July 30, 2019, Individual-1 again entered the Hoboken branch of Victim Bank-1 and made fraudulent withdrawals from Bank Account-1. The teller who conducted the transaction later told law enforcement that HOSEIN inserted himself into the transaction and used his managerial authority to complete the transaction. Surveillance footage captured HOSEIN working to complete the transaction for several minutes. During the transaction, Individual-1 purported to be the authorized accountholder of Bank Account-1 through the use of a fraudulent identification. With HOSEIN's assistance, Individual-1 withdrew approximately \$9,140 in U.S. currency and caused a cashier's check in the amount of approximately \$280,008 to be issued from Bank Account-1.²

7. Victim Bank-1's internal access logs indicate that HOSEIN was one of only two employees to access Bank Account-1 between the time when it was opened in November 2018 and the date of the first fraudulent withdrawal on or about July 18, 2019. Telephone records indicate that Employee-1—the only other employee to have accessed Bank Account-1 during that timeframe—accessed the account in response to a telephone call requesting a change to the account. HOSEIN was accordingly the only employee whose access of Bank Account-1 does not correspond with an account-related request.

¹ The funds from this cashier's check were never released because the receiving bank placed a hold on the check for suspected fraud on or about July 19, 2019.

² Although Individual-1 attempted to use this check as a method of payment, the check was never cashed by the payee.